

Document Review: Addendum H. Solid Waste Operational Complex (SWOC) Closure Units H.1. Low Level Burial Ground (LLBG) Trenches 31 and 34H.1.A Outdoor Storage Area

By: Deborah Singleton

1.0 Introduction:

1. Somewhere in this paragraph, there should be reference to following the modification process for amending the closure plan. Then again, this unit was never in the permit.
2. Do you have a construction date for the DWMU? If so provide it.
3. The sentence: "This closure plan complies with WAC 173-303-610 and represents the baseline for closure is not supported by the regulations". The submitted and approved closure plan must be the basis for closure of the DWMU
4. Revise the following sentence: "The FS-1 outdoor container storage area will be close according to current applicable WAC 173-303 regulations, DOE requirements... to read: The FS-1 outdoor container storage area will be closed accordance with the specifications in this closure plan.(173-303-610 (6)
- 1.1. I cannot agree that the LLBG Trenches 31/34 and 94 are within the same OUG. If this decision has been made, there needs to be a clear definition of what defines an OUG.
- 1.2. Was the MLLW stored in the FS-1 storage area treated to meet LDR prior to storage? If not, what precautions were taken?
 - November 2007 should be changed and records checked to be in agreement with Table 3.1 which identifies waste receipt as early as January 1, 2007
 - Since there is no clear identification of when this DWMU was constructed, did you review records from date of construction to ensure there was not transient use of the area?

2.0 Closure Performance Standard:

1. Revise second bullet to more accurately reflect regulation:

"Control, minimize, or eliminate to the extent necessary to protect human health and the environment, post-closure escape of dangerous waste, dangerous constituents, leachate, contaminated run-off or dangerous waste decomposition products to the ground, surface water, groundwater, or air"

3.0 Closure Activities

1. Since a DQO process is not being used to define the SAP, provide language to define the process used to determine the efficacy of the approach being taken en generating the SAP.

3.3 FS-1 Outdoor Storage Area Operating Records Review

1. The first sentence states to support the development of this closure plan and associated SAP, a review of the FS-1 outdoor storage area operating records was completed. The second sentence would better reflect actions if it read: In addition to the review of the FS-1 outdoor storage area operating record, the records examination also included the following RCRA operating records documents...

3.5 Confirming Clean Closure

Provide a description of what the visual/physical inspection involved. There was no attachment of the walk down inspection